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March 25, 2021

VIA ECF

MEMO ENDORSED

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Rakim Brown, 19 Cr. 513 (SHS)

Dear Judge Stein:

I represent Rakim Brown in the above-referenced matter and write to respectfully request an extension to Saturday, March 27, 2021 to file a motion to suppress evidence obtained pursuant to a January 20, 2016 search of an apartment. The Government has no objection to this request.

Pursuant to our last letter dated March 24, 2021, we had planned to file this motion by Friday, March 26, 2021. However, our last four MDC phone calls with Mr. Brown, including the one scheduled for today, did not occur as scheduled. We cannot file our motion to suppress without a declaration from Mr. Brown, and we need to finalize that with him. The MDC is working to arrange a legal call with Mr. Brown tomorrow, which we hope will happen. Assuming that call happens, we request permission to file our motion on Saturday, March 27, 2021 and apologize for any inconvenience to the Court.

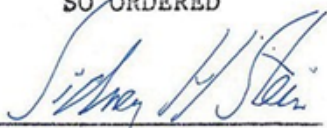
Respectfully submitted,

/s/ Rita M. Glavin
Rita M. Glavin

cc: AUSAs Alexandra Rothman and Mathew Adams (via ECF)

Defendant's request to file his motion to suppress on March 27 is granted. The Assistant U.S. Attorneys assigned to this matter are directed to contact the MDC and to explain to the Court in writing on or before Wednesday, March 31, 2021, why four scheduled calls from defendant to his attorney were not made. The Federal Defenders have informed the Court's chambers that they do not know why the calls were not made.

**Dated: New York, New York
March 26, 2021**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.